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PARAMOUNT EQUITY MORTGAGE, LLC
dba LOANPAL

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DONALD SULLIVAN,

Plaintiff,

v.

PARAMOUNT EQUITY MORTGAGE, LLC
dba LOANPAL,

Defendant.

Case No. 2:19-cv-00567-APG-BNW

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(THIRD REQUEST)

Defendant Paramount Equity Mortgage, LLC dba Loanpal (hereinafter "Loanpal"), by and through its counsel, Timothy J. Lepore of Ropers Majeski Kohn & Bentley, and Plaintiff Donald Sullivan ("Plaintiff"), by and through his counsel, Michael Kind of Kazerouni Law Group, APC, hereby stipulate and agree as follows:

1. On April 4, 2019, Plaintiff filed his Complaint in the United District Court, Central District of Nevada, naming Loanpal as a defendant.

2. On April 5, 2019, this Court issued Summons for Loanpal, directing Loanpal to respond to the Complaint within 21 days after service of the Complaint and Summons.

3. On April 17, 2019, Plaintiff caused for a process server to serve the Complaint and Summons on Loanpal's registered agent. As a result, according to Rule 12 of the Federal Rules of Civil Procedure, Loanpal's last day to respond to Plaintiff's Complaint was May 8, 2019.

4. The parties subsequently entered into settlement negotiations in an attempt to bring

1 this matter to resolution before engaging in protracted litigation.

2 5. On or about May 21, 2019, the parties filed a Stipulation for Extension of Time to
3 Respond to Plaintiff's Complaint (First Request) (ECF No. 8), which the Court subsequently
4 granted (ECF No. 9), making Loanpal's last day to file a responsive pleading or motion to
5 Plaintiff's Complaint June 19, 2019.

6 6. On or about June 17, 2019, the parties filed a Second Stipulation for Extension of
7 Time to Respond to Plaintiff's Complaint, as the parties will still negotiating a settlement to this
8 matter, but did not expect to reach an agreement by June 19, 2019. ECF No. 10. The Court
9 granted this request, extending the deadline for Loanpal to respond to Plaintiff's Complaint to
10 July 19, 2019.

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7. The parties continue to negotiate a settlement to this matter but do not expect to come to an agreement by July 19, 2019. To provide adequate time for the parties to negotiate a settlement and to save the parties and the Court's resources, Plaintiff and Loanpal have stipulated to extend Loanpal's last day to file a responsive pleading or motion to Plaintiff's Complaint by 60 days. Accordingly, Plaintiff and Loanpal request the Court to extend Loanpal's deadline to file a response to Plaintiff's Complaint to September 17, 2019.

IT IS SO STIPULATED.

Dated: July 18, 2019

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Timothy J. Lepore

TIMOTHY J. LEPORE

Attorneys for Defendant

PARAMOUNT EQUITY MORTGAGE,
LLC
dba LOANPAL

Dated: July 18, 2019

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind

MICHAEL KIND

Attorneys for Plaintiff

DONALD SULLIVAN

IT IS SO ORDERED: Defendant Loanpal's last day to file a responsive pleading or motion to Plaintiff's Complaint or Notice of Settlement is September 17, 2019.


UNITED STATES MAGISTRATE JUDGE

Dated: July 22, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July, 2019, I served a true and correct copy of the foregoing **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (THIRD REQUEST)** via the Court's CM/ECF electronic filing and service system to all parties on the current service list.

/s/ Peggy Kurilla

Peggy Kurilla, an employee of
ROPERS, MAJESKI, KOHN & BENTLEY

Ropers Majeski Kohn & Bentley
A Professional Corporation
Los Angeles